

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Tether and Bitfinex Crypto Asset Litigation

No. 19 Civ. 9236 (KPF)

**NOTICE OF THE B/T DEFENDANTS' MOTION TO EXCLUDE  
THE TESTIMONY OF DAVID W. DERAMUS**

PLEASE TAKE NOTICE that, pursuant to this Court's Order Granting Motion for Extension of Time, dated and filed February 18, 2025 (ECF No. 598), and upon the accompanying Memorandum of Law, and all prior pleadings and proceedings in this case, Defendants iFinex Inc., DigFinex Inc., BFXNA Inc., BFXWW Inc., Tether International, S.A. de C.V., Tether Operations, S.A. de C.V., Tether Holdings, S.A. de C.V., Tether Limited, Giancarlo Devasini, and Ludovicus Jan van der Velde, by and through their undersigned counsel, respectfully move this Court before the Honorable Katherine Polk Failla, at the United States Courthouse, 40 Foley Square, Courtroom 618, New York, New York, 10007, for an order: (1) granting the motion, pursuant to Federal Rule of Evidence 702, to exclude the proposed testimony of David W. DeRamus (Dkt. 592-1); and (2) granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
May 2, 2025

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